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Attorney for ADAN NAVARRO

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

THE UNITED STATES OF AMERICA,) No. 2:21-cr-0191 DAD
Plaintiff,)
) STIPULATION AND ORDER MODIFYING
v.) THE SCHEDULE FOR Mr. NAVARRO'S
) PRE-SENTENCE REPORT FOR A NEW
) SENTENCING DATE OF JULY 9, 2024
ADAN NAVARRO,)
)
Defendant.) Judge: Hon. Dale A. Drozd
=====)

Defendant ADAN NAVARRO is requesting a continuance of his sentencing hearing, which is presently set for June 11, 2024. Mr. Long needs more time to respond to the draft pre-sentence report and the informal objections of the government. AUSA David Spencer, on behalf of the United States Attorney's Office, and USPO Steven Davis, on behalf of the United States Probation Office, have no objection to the requested continuance for July 9, 2024. The parties hereby stipulate to re-set the schedule for the Presentence Report as follows:

Judgment and Sentencing Date: July 9, 2024

Reply, or Statement of Non-opposition: July 2, 2024

Motion for Correction of the Presentence Report shall be filed with the Court and served on the Probation Officer and opposing counsel no later than: June 25, 2024

The revised final Presentence Report will be filed with the Court on June 18, 2024

Counsel's informal objections will be filed by June 11, 2024

The draft Presentence Report was filed as ECF document 107

1
2 Dated: May 17, 2024

Respectfully submitted,

3 /s/ Michael D. Long

4 MICHAEL D. LONG

5 Attorney for Andrew Gagnon

6 Dated: May 17, 2024

PHILLIP A. TALBERT

7 United States Attorney

8 /s/ David Spencer

9 DAVID SPENCER

10 Assistant U.S. Attorney

11 ORDER

12 **GOOD CAUSE APPEARING AND HAVING BEEN SHOWN, IT IS SO ORDERED.**

13 The Court hereby orders that the schedule for Mr. Navarro's Presentence Report is
14 amended as follows:

15 Judgment and Sentencing Date: July 9, 2024, at 9:30 a.m.

16 Reply, or Statement of Non-opposition: July 2, 2024

17 Motion for Correction of the Presentence Report shall be filed with the Court and
18 served on the Probation Officer and opposing counsel no later than: June 25, 2024

19 The revised final Presentence Report will be filed with the Court on June 18, 2024

20 Counsel's informal objections will be filed by June 11, 2024

21 The draft Presentence Report was filed as ECF document 107

22
23
24 IT IS SO ORDERED.

25 Dated: May 17, 2024

26 Dale A. Drozd
27 DALE A. DROZD
28 UNITED STATES DISTRICT JUDGE